

WHEREFORE, Staff submits the accompanying Recommendation Memorandum as directed by the Commission's Order issued September 4, 2018, recommending the Commission issue an order (1) rejecting the tariff sheets filed by Spire contained in Tariff File No. YG-2019-0039 and (2) ordering Spire to file P.S.C. MO. No. 7, Tariff Sheet No. 13.2 with a WNAR rate of \$(0.00050) for Spire Missouri East.

Respectfully submitted,

/s/ Jeffrey A. Keevil

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Attorney for the Staff of the
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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand-delivered, or transmitted by facsimile or electronic mail to counsel of record this 14th day of September, 2018.

/s/ Jeffrey A. Keevil

MEMORANDUM

TO: Missouri Public Service Commission Official Case File
File No. GO-2019-0058, Tariff File No. YG-2019-0039
In the Matter of Spire Missouri, Inc.'s d/b/a Spire Request to Decrease

FROM: Robin Kliethermes, Rate and Tariff Examination Manager

/s/ Robin Kliethermes 9/14/2018 /s/ Jeff Keevil 9/14/18
Tariff/Rate Design Department/Date Staff Counsel's Office/Date

SUBJECT: Staff Recommendation for the **Rejection** of the Tariff Sheets Filed by Spire Missouri, Inc., d/b/a Spire ("Spire East") to adjust its Weather Normalization Adjustment Rider

DATE: September 14, 2018

On August 31, 2018, in File No. GO-2019-0058, Spire East filed one tariff revision with Tracking No. YG-2019-0039 to adjust Spire East's weather normalization adjustment rider (WNAR) rate to \$(0.00032).

BACKGROUND

Spire East's weather normalization adjustment rider became effective on April 19, 2018. The purpose of the tariff is to adjust revenues for differences between actual heating degree days (AHDD) and normal heating degree days (NHDD).

STAFF FINDINGS

Staff has reviewed Spire East's workpapers and found that Spire East did not account for the appropriate number of AHDDs and NHDDs occurring between meter read dates per each bill cycle. For example, a customer's meter may be read on April 19th in order to calculate a customer's April bill. Using this example, a customer's bill will include usage ending April 18th. If the bill cycle is 30 days, this customer's April bill would include usage that occurred from March 20th through April 18th. However, when Spire East counted the number of AHDDs and

NHDDs for this bill cycle Spire East included the AHDDs and NHDDs that occurred on April 19th as part of the sum of AHDDs and NHDDs that occurred during the March 20th through April 18th bill cycle. Since the effective date of the WNAR tariff is April 19th, this inaccurate calculation led to a mismatch between the days of the month included in a specific bill cycle and sum of the AHDDs and NHDDs that occurred during the bill cycle. Spire East has indicated that substitute tariffs will be filed to reflect the correction.

Further, Staff determined that Spire East did not appropriately allocate a given month's NHDD among that month's days as provided in the tariff. Staff's NHDD per day as determined in the last rate case were apportioned to the days of each month by aligning the highest level of NHDD to occur in that month with the day that had the highest level of AHDD that occurred in that month. Using this method maintains a consistent comparison between the coldest normal day to occur in that month with the coldest day that actually occurs in the month, while still maintaining the same total number of NHDD determined in the most recent rate case.

Based on the errors mentioned above, Staff has determined that the WNAR rate for Spire East should be \$(0.00050) instead of \$(0.00032) as requested by Spire East. Staff's calculated rate would result in a bill reduction of \$0.05 for a customer using 100 therms a month.

RECOMMENDATION

At this time, Staff recommends the Commission enter an order (1) rejecting the tariff sheets contained in Tracking No. YG-2019-0039; and (2) order Spire East to file Tariff Sheet No. 13.2 with a WNAR rate of \$(0.00050).

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of Spire Missouri, Inc.'s d/b/a)
Spire Request to Decrease WNAR) File No. GO-2019-0058

AFFIDAVIT OF ROBIN KLIETHERMES

STATE OF MISSOURI)
) ss.
COUNTY OF COLE)

COMES NOW ROBIN KLIETHERMES and on her oath declares that she is of sound mind and lawful age; that she contributed to the foregoing Staff Recommendation in Memorandum form; and that the same is true and correct according to her best knowledge and belief.

Further the Affiant sayeth not.

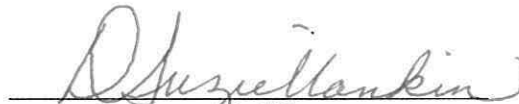


ROBIN KLIETHERMES

JURAT

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Cole, State of Missouri, at my office in Jefferson City, on this 14th day of September, 2018.

D. SUZIE MANKIN Notary Public - Notary Seal State of Missouri Commissioned for Cole County My Commission Expires: December 12, 2020 Commission Number: 12412070
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Notary Public